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6 ||| *Attorneys for Defendants Volkswagen Group of America, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 DYLAN TODD and EMILY TODD,
individuals;

Case No.: 2:16-cv-01735-RFB-PAL

Plaintiffs,

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME**

VOLKSWAGEN GROUP OF AMERICA,
INC., a corporation; VOLKSWAGEN
AKTIENGESELLSCHAFT, a business
entity, form unknown; AND DOES 1
through 20, inclusive.

Defendants.

Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), by and through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiffs Dylan Todd and Emily Todd (“Plaintiffs”), by and through the undersigned counsel of record, the law firm of Hyde & Swigart, hereby stipulate and agree as follows:

In order to conserve the resources of the parties, their counsel and the judiciary, Defendant shall have thirty (30) days to answer or otherwise respond to Plaintiff's Complaint following entry of this Court's decision on Defendant's Motion to Stay (ECF No. 4).

1 Dated this 8th day of August, 2016.	Dated this 8th day of August, 2016.
2 BROWNSTEIN HYATT FARBER SCHRECK, LLP	HYDE & SWIGART
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5 By: <u>/s/ Jeffrey S. Rugg</u>	By: <u>/s/ Sara Khosroabadi</u>
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12	<i>Attorneys for Plaintiffs Dylan Todd and Emily Todd</i>
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15	IT IS SO ORDERED:
16	 UNITED STATES MAGISTRATE JUDGE
17	DATED: August 9, 2016
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CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME** was served via electronic service on the 8th day of August, 2016 and to the addresses shown below:

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/s/ Karen Wiehl
An employee of Brownstein Hyatt Farber Schreck, LLP